OBSERVATION REPORT #98

The "KPMG CLEC" received bills that reflected incorrect charges for Temporary Suspensions of UNE-P accounts.

Background

As per the New Jersey Tariff, for temporary suspensions that are under fifteen days in duration, the full monthly service charge applies in addition to a non-recurring Element 1B charge of either \$16.00 or \$20.19 depending on the type of service, applicable at the time of the suspension.

For temporary suspensions lasting more than fifteen days but less than four months in duration, a one time suspension charge of \$4.60 is applicable in lieu of the monthly service charge, except in cases where the monthly service charge results in lesser charges for the period. In addition, a non-recurring Element 1B charge of \$16.00 or \$20.19 depending on the type of service, applicable at the time of the suspension.

Shown below are excerpts from the New Jersey B.P.U. NJ. No. 2, Exchange and Network Services.

Section B – Rate Treatment¹ states:

"a. Fifteen days or less – No reduction is made in the monthly rates.

"b . Over Fifteen Days- The full local service rate will apply in each billing period of suspension in lieu of the suspension charges specified following whenever this results in lesser charges for the period."

2. Non-recurring charges, "The residence or Business ELEMENT 1B charge applies to the customer's order at the time of suspension.".

¹ New Jersey Tariff Exchange and Network Services, Section A2, Third revised page 23, 2.2.10 Temporary Suspension of Service- Customer Initiated.

Issue

KPMG CLEC bills reflect an inappropriate charge for a one-time charge of \$4.60. In addition, the applicable non-recurring (Element 1B) charges were not applied. Examples of charges contained on KPMG CLEC bills are shown on the below:

Bill Date: September 16, 2000 Master Account: 609-Z07-1015 Component Account: 609-671-5315

| Temporary suspension | One time charge | 609-671-5315 | September 11, 2000 | \$4.60 |
|----------------------------|-----------------|--------------|--------------------|---------|
| Monthly Service charges | Recurring | 609-671-5315 | September 11, 2000 | \$24.05 |

Bill Date: September 16, 2000 Master Account: 609-007-1006 Component Account: 609-404-2836

| Temporary suspension | One time charge | 609-404-2836 | September 7, 2000 | \$4.60 |
|----------------------------|-----------------|--------------|-------------------|---------|
| Monthly Service charges | Recurring | 609-404-2836 | September 7, 2000 | \$24.03 |

Assessment

Issuing bills containing incorrect information requires a CLEC to engage in billing reconciliation activities to identify and correct billing errors thereby increasing a CLECs operating costs.